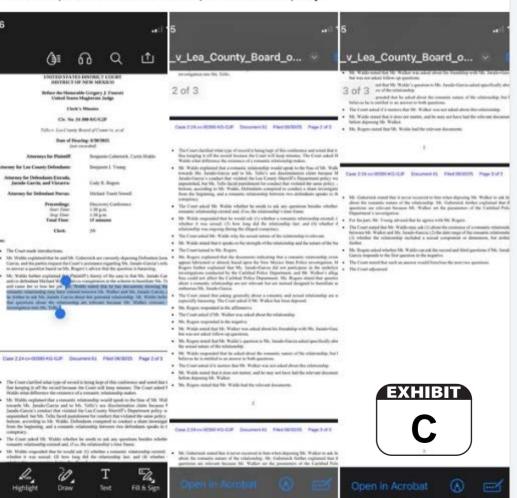
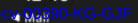
Bombshell News in Tello v Lea County Sheriff's Office

"Mr. Waldo explained that he and Mr. Gubernick are currently deposing Defendant JuradoGarcia, and the parties request the Court's assistance regarding Ms. Jurado-Garcia's refusal to answer a question based on Ms. Rogers's advice that the question is harassing."

"Mr. Waldo stated that he has documents showing that a romantic relationship may have existed between Mr. Walker Lea County Sheriff's Office and Ms. Jurado-Garcia, and he wishes to ask Ms. Jurado-Garcia about this potential relationship. Mr. Waldo believes that questions about the relationship are relevant because Mr. Walker oversaw the investigation into Ms. Tello."

"Mr. Waldo explained that a romantic relationship would speak to the bias of Mr. Walker towards Ms. Jurado-Garcia and to Ms. Tello's sex discrimination claim because Ms. Jurado-Garcia's conduct that violated the Lea County Sherriff's Department policy went unpunished, but Ms. Tello faced punishment for conduct that violated the same policy. At bottom, according to Mr. Waldo, Defendants conspired to conduct a sham investigation from the beginning, and a romantic relationship between two defendants speaks to that conspiracy."





















UNITED STATES DISTRICT COURT DISTRICT OF NEW MEXICO

Before the Honorable Gregory J. Fouratt United States Magistrate Judge

Clerk's Minutes

Civ. No. 24-390 KG/GJF

Tello v. Lea County Board of Comm'rs, et al.

Date of Hearing: 6/30/2025 (not recorded)

Attorneys for Plaintiff:

Benjamin Gubernick, Curtis Waldo

Attorney for Lea County Defendants:

Benjamin J. Young

Attorney for Defendants Estrada. Jurado-Garcia, and Vizcarra:

Cody R. Rogers

Attorney for Defendant Porras:

Michael Truett Newell

Proceedings: Start Time: Discovery Conference 1:39 p.m.

Stop Time: Total Time:

1:56 p.m. 17 minutes

Clerk: IW

Notes:

- The Court made introductions.
- Mr. Waldo explained that he and Mr. Gubernick are currently deposing Defendant Jurado-Garcia, and the parties request the Court's assistance regarding Ms. Jurado-Garcia's refusal to answer a question based on Ms. Rogers's advice that the question is harassing
- Mr. Waldo further explained that Plaintiff's theory of the case is that Ms. Jurado-Garcia and co-defendant Michael W. Are co-conspirators in the scheme to humiliate Ms. Tello and cause her to lose her job. ydr. Waldo stated that he has documents showing that a romantic relationship may have existed between Mr. Walker and Ms. Jurado-Garcia, and he wishes to ask Ms. Jurado-Garcia about this potential relationship. Mr. Waldo believes that questions about the relationship are relevant because Mr. Walker overs investigation into Ms. Tello

Case 2:24-cv-00390-KG-GJF Document 61 Filed 06/30/25 Page 2 of 3

- The Court clarified what type of record is being kept of this conference and noted that it is fine keeping it off the record because the Court will keep minutes. The Court asked Mr. Waldo what difference the existence of a romantic relationship makes
- Mr. Waldo explained that a romantic relationship would speak to the bias of Mr. Walker towards Ms. Jurado-Garcia and to Ms. Tello's sex discrimination claim because Ms. Jurado-Garcia's conduct that violated the Lea County Sherriff's Department policy went unpunished, but Ms. Tello faced punishment for conduct that violated the same policy. At bottom, according to Mr. Waldo. Defendants conspired to conduct a sham investigation from the beginning, and a romantic relationship between two defendants speaks to that conspiracy.
- The Court asked Mr. Waldo whether he needs to ask any questions besides whether a romantic relationship existed and, if so, the relationship's time frame.
- Mr. Waldo responded that he would ask (1) whether a romantic relationship existed; (2) whether it was sexual; (3) how long did the relationship last; and (4) whether the













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investigation into Ms. Tello.



Case 2:24-cv-00390-KG-GJF Document 61 Filed 06/30/25 Page 2 of 3

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- Mr. Waldo responded that he would ask (1) whether a romantic relationship existed; (2) whether it was sexual; (3) how long did the relationship last; and (4) whether the relationship was ongoing during the alleged conspiracy.
- . The Court asked Mr. Waldo why the sexual nature of the relationship is relevant.
- Mr. Waldo stated that it speaks to the strength of the relationship and the nature of the bias.
- · The Court turned to Ms. Rogers,
- Ms. Rogers explained that the documents indicating that a romantic relationship existed
 appear fabricated or altered, based upon the New Mexico State Police investigation. Ms.
 Rogers further explained that Ms. Jurado-Garcia did not participate in the underlying
 investigations conducted by the Carlsbad Police Department, and Mr. Walker's alleged
 bias could not affect the Carlsbad Police Department. Ms. Rogers stated that questions
 about a romantic relationship are not relevant but are instead designed to humiliate and
 embarrans Ms. Jurado-Garcia.
- The Court stated that asking generally about a romantic and sexual relationship are not especially harassing. The Court asked if Mr. Walker has been deposed.
- · Ms. Rogers responded in the affirmative.
- · The Court asked if Mr. Walker was asked about the relationship.
- · Ms. Rogers responded in the negative.
- Mr. Waldo noted that Mr. Walker was asked about his friendship with Ms. Jurado-Garcia but was not asked follow-up questions.
- Ms. Rogers noted that Mr. Waldo's question to Ms. Jurado-Garcia asked specifically about the sexual nature of the relationship.
- Mr. Waldo responded that he asked about the romantic nature of the relationship, but he believes he is entitled to an answer to both questions.
- · The Court asked if it matters that Mr. Walker was not asked about this relationship.
- Mr. Waldo stated that it does not matter, and he may not have had the relevant documents before deposing Mr. Walker.
- Ms. Rogers stated that Mr. Waldo had the relevant documents.

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Case 2:24-cv-00390-KG-GJF Document 61 Filed 06/30/25 Page 3 of 3

 Mr. Gubernick stated that it never occurred to him when deposing Mr. Walker to ask him about the romantic nature of the relationship. Mr. Gubernick further explained that the questions are relevant because Mr. Walker set the parameters of the Carlsbad Police







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Case 2:24-cv-00390-KG-GJF Document 61 Filed 06/30/25 Page 3 of 3

- · Mr. Gubernick stated that it never occurred to him when deposing Mr. Walker to ask him about the romantic nature of the relationship. Mr. Gubernick further explained that the questions are relevant because Mr. Walker set the parameters of the Carlsbad Police Department's investigation.
- · For his part, Mr. Young advised that he agrees with Mr. Rogers.
- . The Court stated that Mr. Waldo may ask (1) about the existence of a romantic relationship between Mr. Walker and Ms. Jurado-Garcia; (2) the date range of the romantic relationship; (3) whether the relationship included a sexual component or dimension, but nothing further.
- · Ms. Rogers asked whether Mr. Waldo can ask the second and third questions if Ms. Jurado-Garcia responds to the first question in the negative.
- The Court stated that such an answer would foreclose the next two questions.
- · The Court adjourned.



